



Via E-Mail

April 29, 2004

Mr. Nabil S. Fayoumi
U. S. Environmental Protection Agency - Region 5
Superfund Division
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Revised Project Schedule
Slurry Wall Excavation, Sauget Area 2, Sauget, Illinois**

Dear Nabil:

Solutia and Pharmacia are sending this letter pursuant to paragraph 85, Section XIX of the September 30, 2002 UAO. This is to advise you of an updated excavation and backfill schedule (enclosed) provided by our contractor, Inquip Associates, Inc. (Inquip). This revised schedule shows completion of the backfilling and demobilizing the slurry wall equipment in mid-November 2004.

We are still reviewing this revised schedule supplied by Inquip. In the revised schedule, Inquip assumes a 15-foot linear progress per day. We believe that this is an aggressive assumption since Inquip has not been able to achieve 15 feet per day of progress for more than a week or two. Our current progress during April-to-date is approximately 13 to 14 linear feet per day. As noted in Gary Vandiver's letter to dated December 8, 2003 entitled "Schedule Extension", Inquip has not been able to achieve the productivity that they originally estimated. The major reasons for the low productivity are i) difficulty in excavating through unexpected quantities of ledge rock and boulders in the path of the bedrock, ii) extraordinary equipment breakdowns due to the increased wear associated with pounding the ledge rocks and boulders, and iii) periods of adverse weather including the subzero weather conditions that required the temporary shutdown of the excavation in February. As you are aware, most of the month of March 2004 was spent cleaning the backfill in the existing trench. Approval to resume backfilling the trench was received from the EPA on March 26, 2004.

We are again hitting ledge rock as we excavate, and believe that we will be hitting ledge rock in the future excavation to come.

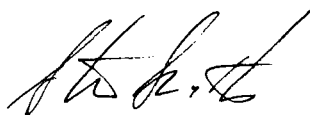
During our previous attempt to work around the clock, the night work was primarily limited to the mechanical clamshell chiseling the ledge rock. Since the hydraulic clam operator relies on being able to see the cables, and since the ground lighting casts shadows on the long cables, it was determined that this clamshell could not be operated safely. We will revisit all of the safety concerns of nighttime operation with the contractor and discuss these issues with you further.

In addition, bringing in additional equipment (to shorten the construction schedule) is not really an option. We are already having difficulties dealing with the confined access and tight work space we have available for this project.

As noted before, we have not completed our review of this revised schedule but are providing it to you to comply with Section XIX of the UAO. We will update you once we complete our review, evaluate any opportunities to increase the number of hours worked per week, and investigate any other way to improve the schedule. As always, we will keep you up-to-date on our progress in our weekly conference calls with you and the Illinois EPA.

Any questions, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Smith', with a stylized, cursive script.

Steve Smith

cc. Sandra Bron - IEPA
Ken Bardo - USEPA
Bruce Yare - Solutia
Cathy Bumb - Solutia

Linda Tape - Husch & Eppenberger
Richard Williams - Solutia
Chris English - CH2M Hill
Tom Martin - USEPA

SCHEDULE FOR COMPLETION OF CUTOFF
(PRODUCTION BASED ON 15 LF PER SHIFT)

